



3. Defendants have, to date, made no appearance in the Civil Action in State Court.

4. The Civil Action is one of which this Court has diversity of citizenship jurisdiction pursuant to 28 U.S.C. § 1332 and removal jurisdiction pursuant to 28 U.S.C. § 1441 in that:

- (a) AGLIC, both at the time of filing of the Civil Action and as of the date of filing of this Notice, was and is a corporate citizen of the State of Texas in that it is and was incorporated in the State of Texas, with its principal place of business in Texas.
- (b) AIG, both at the time of filing of the Civil Action and as of the date of filing of this Notice, was and is a corporate citizen of the States of Delaware and New York in that it is and was incorporated in the State of Delaware, with its principal place of business in New York.
- (c) Plaintiff, both at the time of filing of the Civil Action and as of the date of filing this Notice, was and is a citizen of the State of Tennessee.
- (d) Diversity of citizenship exists between all parties properly joined in that they are citizens of different states and the amount in controversy exceeds \$75,000, exclusive of interest and costs.
- (e) This action is within the original jurisdiction of the Court pursuant to the provisions of 28 U.S.C. § 1332.

5. Defendants have filed this Notice prior to the expiration of thirty (30) days following its receipt of a copy of the Complaint.

6. Defendants will give written notice to plaintiff and will file a Notice of Filing of Notice of Removal with the Clerk of the Chancery Court of Knox County, Tennessee. Defendants attach a copy of the Notice of Filing of Notice of Removal as Exhibit B.

7. The judicial district and division of the Court embraces Knox County, Tennessee, the place where the Civil Action is pending.

WHEREFORE, Defendants, American General Life Insurance Companies, Inc., and American International Group, Inc. pray that the Civil Action now pending against them in the Chancery Court of Knox County, Tennessee, be removed therefrom to this Court.

Respectfully submitted,

/s/ S. Russell Headrick

S. Russell Headrick, TN BPR No. 5750

V. Austin Shaver, TN BPR No. 26581

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*Attorneys for Defendants American General  
Life Insurance Companies, Inc., and  
American International Group, Inc.*

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and exact copy of the foregoing **Notice of Removal** has been filed electronically and has been served upon the following parties in interest herein by delivering same to the offices of said parties in interest, or by mailing same to the offices of said parties in interest by United States Mail with sufficient postage thereon to carry the same to its destination.

James D. Busch  
Bill Hotz & Associates  
6004 Walden Drive  
Knoxville, TN 37919

Howard G. Hogan  
Clerk & Master  
Knox County Chancery Court  
City-County Building  
400 Main Street  
Knoxville, Tennessee 37902

This 21st day of July, 2011.

s/ S. Russell Headrick  
Attorney